

**INTERNAL REVENUE SERVICE
DIRECTOR INTERNATIONAL
COMPETENT AUTHORITY STATISTICS**

Section 1

SUMMARY OF YEAR END INVENTORY

Includes Allocation (A), Non Allocation (N), Limitation on Benefits (L) and Advance Pricing Agreement (P) Cases.

FISCAL YEAR	CASES RECEIVED	CASES DISPOSED	YEAR END INVENTORY
1997	218	190	484
1998	178	214	448
1999	205	228	425
2000	228	175	478
2001	210	189	499
2002	212	228	483

Section 2

PROCESSING TIME ON CLOSED CASES (AVERAGE DAYS)

Includes case types A, N & L only. Refer to Section 9 for Advance Pricing Agreement cases.

FISCAL YEAR	US INITIATED	FOREIGN INITIATED	COMBINED
1997	933	670	807
1998	726	806	761
1999	801	635	715
2000	648	684	668
2001	685	612	642
2002	864	750	804

Section 3

COMPETENT AUTHORITY RELIEF

Includes case types A & N only. Figures represent a percentage of the total dollar adjustment.

RELIEF	1997	1998	1999	2000	2001	2002
Correlative Adjustment	52.87%	41.09%	28.40%	26.55%	25.48%	37.59%
Adjustment Withdrawn	46.17%	45.96%	39.47%	71.87%	48.23%	26.90%
Partial Relief	0.19%	8.20%	3.12%	0.38%	2.52%	26.84%
No Relief*	0.78%	4.45%	29.01%	1.20%	23.77%	8.67%

*Note: In 2001, 81% of this category is due to the withdrawal of a small number of taxpayers from the competent authority process. In 1999, 95% of this category was due to one large case, which resulted in double taxation.

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Section 4

INVENTORY – ALLOCATION CASES ONLY

FISCAL YEAR	US INITIATED RECEIVED / DISPOSED		FOREIGN INITIATED RECEIVED / DISPOSED		YEAR END INVENTORY
1997	89	65	35	39	254
1998	47	89	36	36	212
1999	61	71	32	39	195
2000	48	49	44	35	203
2001	35	44	78	39	233
2002	31	60	63	44	223

Section 5

PROCESSING TIME ON CLOSED ALLOCATION CASES (AVERAGE DAYS)

FISCAL YEAR	US INITIATED	FOREIGN INITIATED	COMBINED
1997	1012	649	876
1998	731	897	779
1999	836	795	821
2000	690	663	679
2001	796	693	747
2002	949	946	948

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Section 6

**INVENTORY – NON ALLOCATION CASES (N)
and LIMITATION ON BENEFITS (L)**

FISCAL YEAR	US INITIATED RECEIVED/DISPOSED		FOREIGN INITIATED RECEIVED/DISPOSED		YEAR END INVENTORY
1997	14	16	41	35	109
1998	10	14	52	44	113
1999	22	18	45	55	107
2000	29	9	49	35	141
2001	14	19	42	53	125
2002	15	21	42	48	113

Section 7

**PROCESSING TIME ON CLOSED NON-ALLOCATION CASES (N)
and LIMITATION ON BENEFITS (L) (AVERAGE DAYS)**

FISCAL YEAR	US INITIATED	FOREIGN INITIATED	COMBINED
1997	612	693	667
1998	696	732	723
1999	663	521	556
2000	420	705	647
2001	429	553	521
2002	622	573	587

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Section 8

INVENTORY – ADVANCE PRICING AGREEMENTS

FISCAL YEAR	CASES RECEIVED	CASES DISPOSED	YEAR END INVENTORY
1997	39	35	121
1998	33	31	123
1999	45	45	123
2000	58	47	134
2001	41	34	141
2002	61	55	147

Section 9

PROCESSING TIME ON ADVANCE PRICING AGREEMENTS

Note: The processing time to complete the Competent Authority process does not include processing time of the APA staff prior to/or subsequent to Competent Authority negotiations.

FISCAL YEAR	AVERAGE DAYS IN C/A OFFICE	AVERAGE DAYS IN APA OFFICE	TOTAL TIME TO CLOSE AN APA
1997	240	485	725
1998	323	603	926
1999	439	511	950
2000	381	648	1029
2001	645	543	1188
2002	484	467	951